

HONE LAW

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Attorneys for Plaintiffs
Christina Jordan, Renee Dean, and Wendy Regge

IN THE UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

CHRISTINA JORDAN,

Plaintiff

vs.

WYNDHAM VACATION OWNERSHIP,
INC., a Nevada corporation; DEMETRIUS
BARNES-VAUGHN, an individual; DOES I
through X, inclusive; and ROE BUSINESS
ENTITIES, I through X, inclusive,

Defendants

WENDY REGGE,

Plaintiff

vs.

WYNDHAM VACATION OWNERSHIP,
INC., et al.,

Defendants

RENEE DEAN,

Plaintiff

vs.

WYNDHAM VACATION OWNERSHIP,
INC., et al.

Defendants

Consolidate for Discovery
Case No. 2:21-cv-02228-CDS-NJK

**STIPULATION AND ORDER
TO CONTINUE STAY FOR
ADDITIONAL 60 DAYS**

(Second Request)



1 Pursuant to the Court's February 13, 2024 Order [ECF 106], Plaintiffs Renee Dean
2 ("Dean"), Christina Jordan ("Jordan"), and Wendy Regge ("Regge," and collectively,
3 "Plaintiffs") and Defendants Wyndham Vacation Ownership, Inc. ("Wyndham") and Demetrius
4 Barnes-Vaughn ("Barnes-Vaughn," and collectively, "Defendants"), by and through their
5 respective counsel of record, hereby file this Joint Status Report and Stipulation and Order to
6 Stay Case for Additional 60 Days (Second Request).

7 1. On the morning of February 5, 2024, Jill Garcia, Plaintiffs' lead counsel,
8 unexpectedly passed away.

9 2. On February 13, 2024, the Court granted the Parties' stipulation and ordered that
10 this matter be stayed for 30 days, and that a Joint Status Report ("Report") be filed on or before
11 March 14, 2024. [ECF 106.]

12 3. During the last 30 days, Hone Law has reviewed and assessed each of the more
13 than 40 open cases that Ms. Garcia was handling and determined that it does not have the
14 capacity to continue to represent the three Plaintiffs in this action.

15 4. Accordingly, Hone Law has informed each of the Plaintiffs that it will need to
16 withdraw from their cases and anticipates filing a Stipulation/Motion to Withdraw as Counsel
17 within the next seven days.

18 5. While Plaintiffs have already begun searching for new counsel (and Hone Law
19 will continue to assist and facilitate the transition to Plaintiffs' new counsel), Plaintiffs require
20 additional time to retain counsel, allow their new counsel to confer with each Plaintiff, and
21 assess the time that will be required to complete discovery in these three consolidated matters.

22 6. On March 12, 2024, Plaintiffs' counsel met and conferred with Defendants'
23 counsel and Defendants' counsel confirmed that they have no objection to Hone Law's
24 withdrawal.

25 7. For the forgoing reasons, the Parties hereby stipulate and agree to continue the
26 stay for an additional 60 days.

27 ///

28 ///



1 8. The Parties further stipulate and agree that on or before May 13, 2024, the Parties
2 will file a joint status report that shall include a proposal for completing discovery in this matter.

3 Dated this 13th day of March 2024.

Dated this 13th day of March 2024.

4 HONE LAW

JACKSON LEWIS P.C.

5 /s/ Kelly B. Stout

/s/ Kathleen C. Shea

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Attorneys for Defendants

Wyndham Vacation Ownership, Inc. and

Demetrius Barnes-Vaughn

14 **IT IS SO ORDERED.**

16 
UNITED STATES DISTRICT JUDGE

17 DATED: March 15, 2024

